## UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF PENNSYLVANIA

ALEXANDRE PELLETIER, Individually and	) Civ. Action No. 2:17-cv-05114-MMB
on Behalf of All Others Similarly Situated,	
· · · · · · · · · · · · · · · · · · ·	<u>CLASS ACTION</u>
Plaintiff,	
	Honorable Michael M. Baylson
vs.	
	$\langle \hspace{0.1cm}$ NOTICE OF MOTION AND MOTION FOR
ENDO INTERNATIONAL PLC, et al.,	FINAL APPROVAL OF SETTLEMENT,
	PLAN OF ALLOCATION, AWARD OF
Defendants.	ATTORNEYS' FEES AND EXPENSES,
(	AND AWARDS TO LEAD PLAINTIFF
	AND CO-LEAD PLAINTIFFS

#### TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the following accompanying documents:

- Memorandum of Law in Support of Motion for Final Approval of Settlement, Plan of Allocation, Award of Attorneys' Fees and Expenses, and Awards to Lead Plaintiff and Co-Lead Plaintiffs;
- Declaration of Lawrence F. Stengel in Support of Motion for Final Approval of Settlement, Plan of Allocation, Award of Attorneys' Fees and Expenses, and Awards to Lead Plaintiff and Co-Lead Plaintiffs;
- Declaration on Behalf of Bucks County Employees Retirement System in Support of Motion for Final Approval of Settlement, Plan of Allocation, Award of Attorneys' Fees and Expenses and Award to Lead Plaintiff;
- Declaration of Alexandre Pelletier in Support of Motion for Final Approval of Settlement, Plan of Allocation, Award of Attorneys' Fees and Expenses and Award to Lead Plaintiff;
- Declaration of Nathan Dole in Support of Motion for Final Approval of Settlement, Plan of Allocation, Award of Attorneys' Fees and Expenses and Award to Lead Plaintiff;
- Declaration of Chad Johnson of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys' Fees and Expenses;
- Declaration of Michael Grunfeld Filed on Behalf of Pomerantz LLP in Support of Application for Award of Attorneys' Fees and Expenses;
- Declaration of D. Seamus Kaskela Filed on Behalf of Kaskela Law LLC in Support of Application for Award of Attorneys' Fees and Expenses;
- Declaration of Joseph A. Fonti of Bleichmar Fonti & Auld LLP in Support of Application for Award of Attorneys' Fees and Expenses;
- Declaration of Jenny Shawver of Angeion Group, Regarding: (A) Mailing of Notice and Proof of Claim; (B) Publication of the Notice; and (C) Report of Requests for Exclusion and Objections Received; and
- all prior pleadings and papers filed herein, and any arguments of counsel or other matters properly before the Court,

Lead Plaintiff Bucks County Employees Retirement System and Co-Lead Plaintiffs Alexandre Pelletier and Nathan Dole, by their undersigned attorneys, will move this Court on February 23, 2022 at 11:00 a.m., by way of a Settlement Hearing (*see* ECF No. 397), for: (1) final

approval of the proposed Settlement and Plan of Allocation, and (2) an award of attorneys' fees and expenses and awards to Lead Plaintiff and Co-Lead Plaintiffs pursuant to 15 U.S.C. §78u-4(a)(4).

DATED: January 19, 2022 Respectfully submitted,

SAXTON & STUMP LAWRENCE F. STENGEL (PA #32809)

# s/Lawrence F. Stengel LAWRENCE F. STENGEL

280 Granite Run Drive, Suite 300 Lancaster, PA 17601 Telephone: 717/556-1000 717/441-3810 (fax) lfs@saxtonstump.com

Lead Class Counsel

ROBBINS GELLER RUDMAN & DOWD LLP
CHAD JOHNSON (Admitted pro hac vice)
NOAM MANDEL (Admitted pro hac vice)
DESIREE CUMMINGS (Admitted pro hac vice)
JONATHAN ZWEIG (Admitted pro hac vice)
420 Lexington Avenue, Suite 1832
New York, NY 10170
Telephone: 212/432-5100
chadj@rgrdlaw.com
noam@rgrdlaw.com
dcummings@rgrdlaw.com
jzweig@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP

DANIEL S. DROSMAN (Admitted *pro hac vice*) KEVIN A. LAVELLE (Admitted *pro hac vice*) SEAN C. McGUIRE (Admitted *pro hac vice*)

655 West Broadway, Suite 1900

San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax)

dand@rgrdlaw.com klavelle@rgrdlaw.com smcguire@rgrdlaw.com

Co-Lead Class Counsel

JOSEPH J. KHAN (PA #86620)
County Solicitor, Bucks County
AMY M. FITZPATRICK (PA #324672)
First Assistant County Solicitor, Bucks County
55 East Court Street
Doylestown, PA 18901
Telephone: 215/348-6435
jjkhan@buckscounty.org
amfitzpatrick@buckscounty.org

Additional Counsel for Lead Class Representative Bucks County Employees Retirement System

POMERANTZ LLP JEREMY A. LIEBERMAN MICHAEL GRUNFELD 600 Third Avenue New York, NY 10016 Telephone: 212/661-1100 212/661-8665 (fax) jalieberman@pomlaw.com mgrunfeld@pomlaw.com

POMERANTZ LLP
PATRICK V. DAHLSTROM
10 South LaSalle Street, Suite 3505
Chicago, IL 60603
Telephone: 312/377-1181
312/377-1184 (fax)
pdahlstrom@pomlaw.com

Counsel for Co-Lead Plaintiffs

## CERTIFICATE OF SERVICE

I, Lawrence F. Stengel, hereby certify that on January 19, 2022, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

s/ Lawrence F. Stengel
LAWRENCE F. STENGEL

SAXTON & STUMP 280 Granite Run Drive, Suite 300 Lancaster, PA 17601 Telephone: 717/556-1000 717/441-3810 (fax)

E-mail: lfs@saxtonstump.com

# Mailing Information for a Case 2:17-cv-05114-MMB PELLETIER v. ENDO INTERNATIONAL PLC et al

#### **Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

#### • JAVIER BLEICHMAR

jbleichmar@bfalaw.com

#### • JAMES E. BRANDT

james.brandt@lw.com,NY-CourtMail@lw.com

#### • BENJAMIN F. BURRY

bburry@bfalaw.com

#### • J. GORDON COONEY, JR

jgcooney@morganlewis.com

#### VINCENT A COPPOLA

vcoppola@pribanic.com,gregory@pribanic.com

#### • BRANDON CORDOVI

bcordovi@pomlaw.com

#### • DESIREE CUMMINGS

 $dcummings@rgrdlaw.com, selenac@rgrdlaw.com, e\_file\_SD@rgrdlaw.com$ 

#### • PATRICK V. DAHLSTROM

pdahlstrom@pomlaw.com

#### • BLAKE T DENTON

blake.denton@lw.com

#### • DANIEL S. DROSMAN

ddrosman@rgrdlaw.com, tho lindrake@rgrdlaw.com, dand@ecf.courtdrive.com

#### • JOSEPH A. FONTI

jfonti@bfalaw.com,ecfnotifications@bfalaw.com

#### • JONATHAN GARDNER

jg ard ner@labaton.com, lpina@labaton.com, 4027988420@filings.docketbird.com, accoquin@labaton.com, accarpio@labaton.com, electronic case filing@labaton.com, accorpio.gov.com, accarpio.gov.com, accarpio.gov.c

#### THOMAS J. GIBLIN, JR

thomas.giblin@lw.com,ny-court mail@lw.com,new-york-ma-2860@ecf.pacerpro.com, thomas-giblin-4784@ecf.pacerpro.com, thomas

#### • MARK S. GOLDMAN

goldman@lawgsp.com, lamar@lawgsp.com

#### • MICHAEL GRUNFELD

mgrunfeld@pomlaw.com, disaacson@pomlaw.com, abarbosa@pomlaw.com

#### • JEFF G. HAMMEL

jeff.hammel@lw.com,NY-CourtMail@lw.com,jeff-hammel-1442@ecf.pacerpro.com,new-york-managing-attorney-8224@ecf.pacerpro.com

#### • J. ALEXANDER HOOD, II

ahood@pomlaw.com, abarbosa@pomlaw.com

#### · CHAD JOHNSON

chadj@rgrdlaw.com

#### • DAVID SEAMUS KASKELA

skaskela@kaskelalaw.com

### • EVAN A. KUBOTA

ekubota@bfalaw.com

#### • KEVIN A. LAVELLE

klavelle@rgrdlaw.com,e file sd@rgrdlaw.com,kwoods@rgrdlaw.com

#### • PETER H. LEVAN, JR

plevan@levanmuhic.com

#### • JEREMY A. LIEBERMAN

jalieberman@pomlaw.com, taweinrib@pomlaw.com, egoodman@pomlaw.com, disaacson@pomlaw.com, disaacson.good.

#### NOAM MANDEL

noam@rgrdlaw.com

### 10/15/21, 9:01 AM Case 2:17-cv-05114-MMBniteD states to British to Out the Parish of 7

#### SEAN MCGUIRE

 $smcguire@rgrdlaw.com, nhorstman@rgrdlaw.com, kwoods@rgrdlaw.com, e\_file\_SD@rgrdlaw.com, mwaligurski@rgrdlaw.com, nhorstman@rgrdlaw.com, nhorstman@rgrdlaw.com,$ 

#### • LAURA H. MCNALLY

laura.mcn ally @morgan lewis.com, carole.griffin @morgan lewis.com, laura-mcn ally -4300 @ecf.pacerpro.com, laura-mcn allow -4300 @ecf.pacerpro.com, laura-mcn allow -4300 @ecf.pacerpro.com, laura-mcn allow -4300 @ecf.pacerpro.com, laura-mcn all

#### • CARSON MORRIS

cbm@saxtonstump.com

#### GREGORY MORTENSON

gregory.mortenson@lw.com

#### • DANIELLE S. MYERS

danim@rgrdlaw.com,dmyers@ecf.courtdrive.com,e file sd@rgrdlaw.com

## • SUSAN R. PODOLSKY

spodolsky@podolskylaw.com

#### • MILES N. RUTHBERG

miles.ruthberg@lw.com,NY-CourtMail@lw.com

#### • MARC J. SONNENFELD

msonnenfeld@morganlewis.com, pfiggs@morganlewis.com

#### • LAWRENCE F. STENGEL

lfs@saxtonstump.com, cag@saxtonstump.com, cbm@saxtonstump.com

#### • JOHN S. SUMMERS

jsummers@hangley.com,crearick@hangley.com,ecffilings@hangley.com

#### • JONATHAN C. ZWEIG

jzweig@rgrdlaw.com,e file sd@rgrdlaw.com

#### **Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

• (No manual recipients)